

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MONALISA HART,

Plaintiff,

v.

**PORTFOLIO RECOVERY
ASSOCIATES, LLC,**

Defendant.

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CASE NO. 2:21-cv-193

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that on this date, Defendant Portfolio Recovery Associates, LLC hereby removes the above-captioned matter to this Court from the Court of Common Pleas of Allegheny County, Pennsylvania and in support thereof avers as follows:

1. Portfolio Recovery Associates, LLC is a defendant in a civil action originally filed on September 16, 2020 in the Court of Common Pleas of Allegheny County, Pennsylvania titled *Monalisa Hart v. Portfolio Recovery Associates, LLC* and docketed to Case No. GD-20-004570.

2. This removal is timely under 28 U.S.C. § 1446(b). PRA received service of Plaintiff's Complaint via certified mail on January 11, 2021.

3. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibit A are copies of all pleadings, process and orders filed in the state court action.

4. This Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against PRA alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

5. On this date, PRA has provided notice of this Removal to counsel for Plaintiff and to the Court of Common Pleas of Allegheny County, Pennsylvania.

WHEREFORE, Defendant Portfolio Recovery Associates, LLC respectfully removes this case to the United States District for the Western District of Pennsylvania.

Respectfully submitted,

MESSER STRICKLER, LTD.

By: /s/ Lauren M. Burnette
LAUREN M. BURNETTE, ESQUIRE
PA Bar No. 92412
12276 San Jose Blvd.
Suite 718
Jacksonville, FL 32223
(904) 527-1172
(904) 683-7353 (fax)
lburnette@messerstrickler.com
Counsel for Defendant

Dated: February 10, 2021

CERTIFICATE OF SERVICE

I certify that on February 10, 2021, a true copy of the foregoing document was served
as follows:

Via Email and U.S. Mail, Postage Prepaid

Joshua P. Ward
Kyle H. Steenland
The Law Firm of Fenters Ward
The Rubicon Building
201 South Highland Avenue
Suite 201
Pittsburgh, PA 15206
JWard@FentersWard.com
KSteenland@FentersWard.com
Counsel for Plaintiff

Via Electronic Filing

Court of Common Pleas
Allegheny County
414 Grant Street
Pittsburgh, PA 15219

MESSER STRICKLER, LTD.

By: */s/ Lauren M. Burnette*
LAUREN M. BURNETTE, ESQUIRE
PA Bar No. 92412
12276 San Jose Blvd.
Suite 718
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(904) 527-1172
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Dated: February 10, 2021